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**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SAMANTHA SIVA KUMARAN,

*Plaintiff,*

-against-

NORTHLAND ENERGY TRADING, LLC

RICHARD M. LARKIN

HEDGE SOLUTIONS, INC

DOMENIC BRAMANTE

DANIEL LOTHROP

*Defendants,*

)  
Case No:1:19-CV-08345-MKV-DCF  
) Judge: Hon Mary Kay Vyskocil  
) Magistrate Judge: Debra C. Freeman  
)  
**) PLAINTIFF'S MOTION  
FOR TEMPORARY RESTRAINING  
ORDER**

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**PLAINTIFFS MOTION FOR TEMPORARY RESTRAINING ORDER**

**PLEASE TAKE NOTICE** that pursuant to FRCP 65, and FRCP 5.2(e)(1) and FRCP 26.(c), and in accordance with the accompanying Motion for Protective Order, Plaintiff Kumaran (herein called "Plaintiff") is moving for a Temporary Restraining Order to the Honorable May Kay Vyskocil, United States District Judge, at the United States District Courthouse for the Southern District of New York, for an order granting a temporary restraining order as requested herein.

**PLEASE TAKE FURTHER NOTICE** that the Temporary Restraining Order sought by Plaintiff is seeking immediate relief from the Court that the Defendants and each of its members, officers, agents, servants and employees, and any parties under their direction or control or acting in concert or participation with them, are hereby preliminarily enjoined or required as follows:

(a) to file their Motion to Dismiss under Seal until the Court rules on the attached Motion for Protective Order;

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(b) to refrain from publishing, disseminating or otherwise including any further confidential, trade secret and other proprietary information (including disputed materials) in any pleadings, prior to a Court Ruling on the Motion for Protective Order;

(c) provide Plaintiff the opportunity to provide redactions and dispute confidentiality designations prior to publication, in accordance with the proposed Protective Order.

Plaintiff further respectfully seeks relief from the Court to adopt Defendant's requested extension for time and proposed schedule (*See* Dkt 32, Dkt 33) which Plaintiff has consented to, as follows:

- (i) Defendants file their Motion to Dismiss on March 13<sup>th</sup> 2020,
- (ii) Plaintiff's file their Opposition to MTD on May 13<sup>th</sup> 2020, and
- (iii) Defendant's file their reply due on June 15<sup>th</sup>, 2020;

or as otherwise extended by the Court, so that the parties have time to resolve the Motion for Protective Order. This relief is narrowly focused and intended and to prevent irreparable harm of further inadvertent disclosures of disputed confidential information and trade secrets being published.

SO ORDERED

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Hon. Judge Mary Kay Vyskocil

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Dated